UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA

BRANDON BELNA,
Plaintiff,

v. Case No.: _____

BONTERRA, INC. and NGP VAN, INC.,
Defendants.

COMPLAINT FOR VIOLATIONS OF THE AMERICANS WITH DISABILITIES ACT

Plaintiff Brandon Belna, appearing pro se, files this Complaint against Defendants Bonterra, Inc. and NGP VAN, Inc. Plaintiff alleges as follows:

I. INTRODUCTION

This is an employment discrimination action under Title I of the Americans with Disabilities Act of 1990, as amended, 42 U.S.C. § 12101 et seq.

Plaintiff brings this action because Defendant discriminated against him on the basis of disability, failed to reasonably accommodate known disability-related limitations, failed to engage in a timely and good-faith interactive process, retaliated against protected activity, and allowed or caused disability-related harassment and hostile treatment.

Beginning in or around January 2026, Defendant, through management, questioned, dismissed, minimized, or invalidated disability-related medical information and diagnosis information.

In or around March 2026, Defendant was placed on notice that Plaintiff was suffering from amnesia and related disability symptoms, but Defendant failed to respond appropriately.

In or around April 2026, Defendant requested or addressed accommodation-related issues only after months of disability-related concerns had already been raised.

During the final week of April 2026, Plaintiff was subjected to bullying, harassment, insults, humiliation, and hostile treatment by coworkers and/or employees of Defendant.

Defendant knew or should have known about the disability-related nature of the situation and failed to take prompt and effective corrective action.

II. PARTIES

1. Plaintiff Brandon Belna is an individual residing in DeLand, Florida.
2. Defendant NGP VAN, Inc. is an employer that employed Plaintiff during the relevant period.
3. Defendant Bonterra, Inc. is an employer and/or related entity that, at all relevant times, owned, operated, controlled, or acted as a joint or integrated employer with NGP VAN, Inc. with respect to Plaintiff's employment.
4. At all relevant times, Defendant was an employer covered by the ADA because it had 15 or more employees.
5. At all relevant times, Plaintiff was an employee protected by the ADA.

III. JURISDICTION AND VENUE

6. This Court has federal-question jurisdiction under 28 U.S.C. § 1331 because this action arises under federal law, specifically the Americans with Disabilities Act.

7. This Court has jurisdiction over Plaintiff's ADA employment claims under 42 U.S.C. § 12117.

8. Venue is proper in this District because a substantial part of the events or omissions giving rise to the claims occurred in this District, Plaintiff worked in this District, Defendant conducted business in this District, Defendant made employment decisions affecting Plaintiff in this District, and/or relevant employment records are maintained or administered in this District.

9. Defendant is subject to personal jurisdiction in this District because Defendant employed Plaintiff, conducted business, directed employment conduct, and/or caused employment-related harm in this District.

IV. EXHAUSTION OF ADMINISTRATIVE REMEDIES

10. [Plaintiff timely filed a Charge of Discrimination against Defendant with the Equal Employment Opportunity Commission (EEOC) on or about _____, 20__, EEOC Charge No. _____.]

11. [The EEOC issued Plaintiff a Notice of Right to Sue dated on or about _____, 20__, a true and correct copy of which is attached as Exhibit A.]

12. [Plaintiff files this Complaint within ninety (90) days of his receipt of the Notice of Right to Sue and has therefore satisfied and exhausted all administrative prerequisites to bringing this action.]

V. FACTUAL ALLEGATIONS

13. Plaintiff Brandon Belna worked for Defendant as a Software Engineer during the relevant period.

14. Plaintiff was qualified to perform the essential functions of his job, with or without reasonable accommodation.

15. Plaintiff had a disability, a record of a disability, and/or was regarded by Defendant as having a disability within the meaning of the ADA.

16. Defendant became aware that Plaintiff had disability-related medical conditions, symptoms, limitations, diagnoses, and/or accommodation needs.

17. In or around January 2026, a manager, supervisor, or other representative of Defendant invalidated, questioned, dismissed, or minimized Plaintiff's diagnosis by suggesting that Plaintiff did not have the diagnosis or condition that had been disclosed.

18. Defendant's January 2026 conduct placed Plaintiff in the position of having disability-related medical information questioned or rejected by management rather than handled through a proper ADA process.

19. In or around March 2026, Defendant was informed that Plaintiff was suffering from amnesia or amnesia-related symptoms.

20. Defendant failed to respond appropriately to the March 2026 disclosure of amnesia and did not timely engage in a meaningful interactive process.

21. Defendant ignored, minimized, delayed, or mishandled disability-related information that should have triggered further discussion, support, accommodation analysis, or referral to Human Resources or an appropriate accommodation decisionmaker.

22. In or around April 2026, Defendant asked about or addressed accommodations only after disability-related issues had already been raised in January and March 2026.

23. Defendant's delay caused harm to Plaintiff and contributed to a hostile, unsafe, humiliating, and discriminatory work environment.

24. Plaintiff requested, needed, or was entitled to reasonable accommodations related to disability symptoms and limitations.

25. Defendant failed to provide reasonable accommodations and failed to engage in a timely, individualized, good-faith interactive process.

26. Defendant did not adequately explain the accommodation process, identify effective accommodations, protect Plaintiff from disability-based mistreatment, or respond reasonably to known disability-related issues.

27. During the final week of April 2026, Plaintiff was bullied, harassed, insulted, humiliated, and treated abusively by coworkers and/or employees of Defendant.

28. The hostile treatment during the final week of April 2026 was related to, connected with, or occurred after disability-related disclosures, symptoms, accommodation issues, or protected activity.

29. Defendant knew or should have known about the harassment and failed to take prompt and effective corrective action.

30. Defendant's managers, supervisors, Human Resources personnel, employees, and/or agents participated in, condoned, ignored, failed to prevent, or failed to correct the discriminatory and retaliatory treatment.

31. Plaintiff was subjected to adverse employment actions and materially harmful treatment after Defendant became aware of disability-related information and/or after Plaintiff engaged in protected activity.

32. The adverse treatment included, but was not limited to, denial or delay of accommodations, invalidation of diagnosis, failure to respond to amnesia-related symptoms, harassment, bullying, insults, humiliation, hostile treatment, and other changes to the terms, conditions, or privileges of employment.

33. Defendant's stated reasons for its conduct, to the extent any were given, were pretextual, incomplete, inconsistent, or not the true reasons for the treatment of Plaintiff.

34. Defendant's conduct caused Plaintiff harm, including emotional distress, humiliation, loss of income or employment-related benefits, professional harm, reputational harm, inconvenience, and other damages.

VI. COUNT I — DISABILITY DISCRIMINATION IN VIOLATION OF THE ADA

35. Plaintiff repeats and realleges all prior paragraphs as if fully stated here.

36. Plaintiff was a qualified individual with a disability under the ADA.

37. Defendant knew or should have known of Plaintiff's disability, disability-related limitations, medical conditions, symptoms, diagnoses, and/or accommodation needs.

38. Defendant discriminated against Plaintiff because of disability by invalidating or disregarding disability-related medical information, failing to respond appropriately to known disability symptoms, treating Plaintiff less favorably, allowing hostile treatment, and changing the terms, conditions, or privileges of employment.

39. Defendant's conduct violated the ADA.

40. As a direct and proximate result of Defendant's conduct, Plaintiff suffered damages.

VII. COUNT II — FAILURE TO ACCOMMODATE AND FAILURE TO ENGAGE IN THE INTERACTIVE PROCESS

41. Plaintiff repeats and realleges all prior paragraphs as if fully stated here.

42. Plaintiff had a disability and disability-related limitations requiring reasonable accommodation.

43. Defendant had notice of Plaintiff's disability-related limitations, symptoms, diagnoses, or need for assistance.

44. Plaintiff requested accommodations or otherwise provided Defendant with enough information to place Defendant on notice that workplace changes or support were needed for disability-related reasons.

45. Defendant failed to provide reasonable accommodations.

46. Defendant failed to engage in a timely, individualized, and good-faith interactive process.

47. Defendant delayed accommodation-related action until in or around April 2026 despite earlier disability-related notice in or around January 2026 and March 2026.

48. Reasonable accommodations were available and would not have imposed an undue hardship on Defendant.

49. Defendant's failure to accommodate and failure to engage in the interactive process violated the ADA.

50. As a direct and proximate result of Defendant's conduct, Plaintiff suffered damages.

VIII. COUNT III — RETALIATION IN VIOLATION OF THE ADA

51. Plaintiff repeats and realleges all prior paragraphs as if fully stated here.

52. Plaintiff engaged in protected activity by disclosing disability-related needs, discussing medical conditions or symptoms, requesting accommodations, opposing invalidation of diagnosis, objecting to mistreatment, and/or complaining about disability discrimination or related treatment.

53. Defendant knew Plaintiff engaged in protected activity.

54. After Plaintiff engaged in protected activity, Defendant subjected Plaintiff to materially adverse actions and treatment.

55. The timing and circumstances of Defendant's conduct support a causal connection between Plaintiff's protected activity and the adverse treatment.

56. Defendant's retaliation violated the ADA.

57. As a direct and proximate result of Defendant's conduct, Plaintiff suffered damages.

IX. COUNT IV — DISABILITY-BASED HARASSMENT / HOSTILE WORK ENVIRONMENT

58. Plaintiff repeats and realleges all prior paragraphs as if fully stated here.

59. Plaintiff was subjected to bullying, harassment, insults, humiliation, and hostile treatment during the final week of April 2026.

60. The harassment was related to disability, perceived disability, disability symptoms, diagnosis information, accommodation issues, and/or protected activity.

61. The harassment was severe or pervasive enough to alter the conditions of employment, create an abusive working environment, or cause legally cognizable harm.

62. Defendant knew or should have known of the harassment and failed to take prompt and effective corrective action.

63. Defendant’s conduct violated the ADA.

64. As a direct and proximate result of Defendant’s conduct, Plaintiff suffered damages.

X. COUNT V — IMPROPER HANDLING OR MISUSE OF DISABILITY-RELATED INFORMATION

65. Plaintiff repeats and realleges all prior paragraphs as if fully stated here.

66. Plaintiff provided or disclosed disability-related medical information, diagnosis information, symptoms, limitations, or accommodation-related information to Defendant.

67. Defendant was required to handle disability-related medical information appropriately and lawfully.

68. Defendant improperly questioned, used, discussed, disregarded, minimized, or relied on disability-related information in a manner that harmed Plaintiff.

69. Defendant's handling or misuse of disability-related information contributed to discrimination, failure to accommodate, retaliation, harassment, and hostile treatment.

70. Defendant's conduct violated the ADA.

71. As a direct and proximate result of Defendant's conduct, Plaintiff suffered damages.

XI. DAMAGES

72. Plaintiff suffered damages including, but not limited to, emotional distress, humiliation, anxiety, mental anguish, inconvenience, loss of income, loss of benefits, professional harm, reputational harm, and other compensable injuries.

73. Defendant's conduct was intentional, willful, malicious, reckless, or taken in reckless disregard of Plaintiff's federally protected rights.

XII. REQUEST FOR RELIEF

Plaintiff respectfully requests that the Court enter judgment in his favor and grant the following relief:

A. A declaration that Defendant violated the ADA;

B. Back pay, front pay, lost benefits, and other economic damages;

C. Compensatory damages for emotional distress, humiliation, inconvenience, and other non-economic harm;

D. Punitive damages to the extent permitted by law;

E. Reinstatement, correction of employment records, neutral reference relief, policy changes, training, or other equitable relief as appropriate;

F. An order requiring Defendant to comply with the ADA and prevent future disability discrimination, retaliation, and harassment;

G. Prejudgment and post-judgment interest;

H. Costs and attorney's fees to the extent permitted by law; and

I. Any other relief the Court deems just and proper.

XIII. JURY DEMAND

Plaintiff demands a trial by jury on all issues so triable.

Respectfully submitted,

Dated: _____

_____

Brandon Belna
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DeLand, FL 32720
Phone: _____
Email: _____
Plaintiff, pro se